



ENZYMATIC THERAPY

INCORPORATED

*What **Better** feels like.™*

INTEGRATIVE THERAPEUTICS INC.™

NF Formulas • PhytoPharmica
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9755 SW Commerce Circle, Suite B2
Wilsonville, OR 97070
P: 503.582.8386 • F: 503.582.0467

ENZYMATIC THERAPY® & PHYTOPHARMICA®

825 Challenger Drive, Green Bay, WI 54311-8328
P: 920.469.1313 • F: 888.570.6460 (Enzymatic)
P: 920.469.9099 • F: 920.469.4418 (Phyto)

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November 21, 2005

Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 810
Center for Food Safety and Applied Nutrition
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740

NOV 23 2005

RE: Label Claims/Disclaimers

Dear Sir or Madam:

This letter is to notify you that the following product is Manufactured, Packed, and/or Distributed by Enzymatic Therapy, Inc. at 825 Challenger Drive, Green Bay, Wisconsin 54311 has a label that contains a statement provided by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. Enzymatic Therapy, Inc. wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and comply with section 403(r)(6) of the act. These claims are not necessarily for a product we currently market or plan to market in the immediate future, and may be exploratory in nature.

PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	A unique combination of ingredients stimulate bile flow, which help rid the liver of toxins.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

I certify that the information contained in this notice is complete and accurate and that Enzymatic Therapy, Inc. has substantiation that the statements are truthful and not misleading.

By: Robert Doster

Title: Senior Vice President of Scientific Affairs

Date: 11/21/05

If you have any questions, please contact Robert Doster, Senior Vice President of Scientific Affairs at (920) 406-3608.

Sincerely,

Michael P. Devereux

Michael P. Devereux
Chief Financial Officer

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Complete Liver Cleanse is a more targeted approach to cleansing – supporting the natural health of the liver and gallbladder by assisting healthy bile flow.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Herbal ingredients have noted benefits for supporting the body's healthy bile flow and free-radical scavenging effects. As such, they show a wide spectrum of liver-supportive benefits.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

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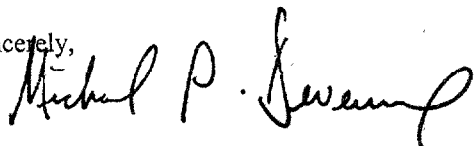
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	If there is no fiber to catch up these toxins and carry them out of the body there is a good chance they can just be reabsorbed and circulate through our systems again.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

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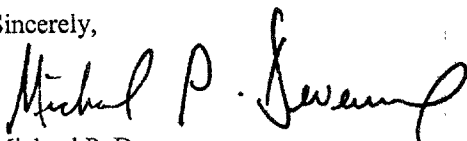
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PRODUCT NAME	STATEMENTS	INGREDIENT(S) TO WHICH THE CLAIM REFERS
Complete Liver Cleanse*	Fibers such as oat beta-glucan and konjac fiber, that more effectively bind bile salts, will be the most successful at giving you a thorough cleanse.*	Viscofiber Beta Glucan (Oat)

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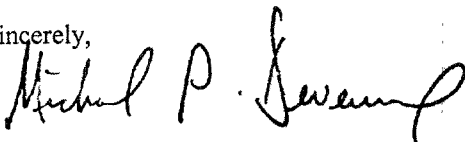
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Complete Liver Cleanse*	Fiber should have a higher viscosity in order to slow the time it takes to move through the intestines, while providing a gentle "scrubbing" on the intestinal walls. The higher the viscosity, the greater the potential benefit.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

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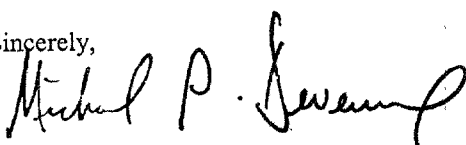
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Complete Liver Cleanse*	Complete Liver Cleanse contains substances that stimulate the liver to greater activity and higher levels of efficiency. It also increases the bile output of the liver.*	Cholestatin, Viscofiber Beta Glucan (Oat), Turmeric Root DC (95% Curcuminoids), Glucomanan, Calcium D-Glucarate, Vitamin C (ascorbic acid), Boldo Leaf Extract (Peumus boldo), Burdock Root Extract, Silymarin Phytosome, Artichoke Leaf, Dandelion Root Extract

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